

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

**FILED**

MAY 23 2016

DAVID CREWS, CLERK  
BY *D. Adams* Deputy

UNITED STATES OF AMERICA

v.

CRIMINAL CASE NO. 3:16CR051

18 U.S.C. § 2251(a)

18 U.S.C. § 2256(2)(A)(v)

18 U.S.C. § 2256(8)(A)

18 U.S.C. § 2422(b)

THOMAS MUHAMMED DARWISH

**INDICTMENT**

The Grand Jury charges that:

**Count One**

On or about March 2, 2016, in the Northern District of Mississippi, THOMAS MUHAMMED DARWISH, defendant, did knowingly use, persuade, induce, entice, and coerce, and attempt to use, persuade, entice, and coerce a minor to engage in sexually explicit conduct, being the lascivious exhibition of her pubic area and genitalia, for the purpose of producing a visual depiction of the lascivious exhibition of her genitalia and pubic area, knowing that the visual depiction would be transported and transmitted using means and facilities in interstate commerce, being cellular telephone messages, in violation of Title 18, United States Code, Sections 2251(a), 2256(2)(A)(v), 2256(5), and 2256(8)(A).

**Count Two**

On or about March 2, 2016, in the Northern District of Mississippi, THOMAS MUHAMMED DARWISH, defendant, did knowingly receive a visual depiction which involved the use of a minor engaging in sexually explicit conduct and which is of a minor engaging in sexually explicit conduct, being the lascivious exhibition of the minor's genitalia and pubic area, using a means and facility of interstate commerce, being cellular telephone communications, in

violation of Title 18, United States Code, Sections 2252(a)(2), 2256(2)(A)(v), 2256(5), and 2256(8)(A).

**Count Three**

From on or about August 1, 2015 to on or about September 25, 2015, in the Northern District of Mississippi, THOMAS MUHAMMED DARWISH, defendant, did knowingly, using facilities and means of interstate commerce, being cellular telephone and Internet communications, persuade, induce, entice, and attempt to persuade, induce, and entice an individual who had not then attained the age of 18 years of age, being a 15 year old minor, to engage in sexual relations with THOMAS MUHAMMED DARWISH, for which actions, THOMAS MUHAMMED DARWISH, the 24 years of age, could be charged with the offenses of statutory rape under Mississippi state law (Miss. Code Ann. § 97-3-65(a)) and sexual battery under Mississippi state law (Miss. Code Ann. 97-3-95(1)(c)), all in violation of Title 18, United States Code, Section 2422(b).

**A TRUE BILL**

/s/ Signature Redacted  
**FOREPERSON**

*Felicia C. Carter*  
**UNITED STATES ATTORNEY**